

**McKENNA, DuPONT, STONE & WASHBURNE, PC**

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Attorneys for Creditor, ABCO Federal Credit Union

Our File No. 53719

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

_____	:	Chapter 13, Case No. 19-10008
Douglas E. Waldron		
Patricia L. Waldron	:	Honorable Andrew B. Altenburg, Jr.
	:	Confirmation Hearing: May 19, 2023
Debtors.		
_____	:	

**NOTICE OF OBJECTION TO CONFIRMATION OF PLAN  
PURSUANT TO BANKRUPTCY RULE 3015**

The undersigned attorneys for ABCO Federal Credit Union, a creditor of debtor, hereby objects to the confirmation of the debtors' proposed Chapter 13 Plan on the basis of:

1. Debtors purchased a vehicle after the filing of the chapter 13 bankruptcy case through ABCO Federal Credit Union. The chapter 13 plan outlines in Part 4(g) of the plan that the collateral is unsecured and \$0.00 to be paid. The borrowers' account is current, however, since the loan was taken after the bankruptcy filing, the Chapter 13 plan cannot include a post petition loan.
2. Debtors plan is not in good faith and needs to be Modified to remove the account of ABCO Federal Credit Union.

For the reason stated above, and for any others that the Court deems fair, creditor respectfully requests that confirmation of debtor's proposed plan be denied.

**McKENNA, DuPONT, STONE & WASHBURNE, PC**  
Attorneys for Creditor, ABCO Federal Credit Union

By: /s/ Michael R. Du Pont  
MICHAEL R. DuPONT, Esq.

Dated: March 10, 2023